

# Arent Fox

Arent Fox LLP / Attorneys at Law  
Boston / Los Angeles / New York / San Francisco / Washington, DC

February 14, 2020

VIA ECF

Hon. Frederic Block  
United States District Court Judge  
Eastern District of New York  
225 Cadman Plaza East  
Courtroom 10C South  
Brooklyn, NY 11201

**Glenn Colton**

Partner  
212.484.3972 DIRECT  
212.484.3990 FAX  
glenn.colton@arentfox.com

Re: *United States v. John Simonlacaj*, 19-cr-575 (FB)

Dear Judge Block:

We write on behalf of defendant John Simonlacaj in the above-referenced matter to respectfully request the temporary modification of his conditions of pretrial release to permit him to travel to Sellersville, Pennsylvania for one day on February 22, 2020 for the purposes of a family trip, and to travel to Boston, Massachusetts from May 14-17, 2020 to attend his son's college graduation and related events. Currently, Mr. Simonlacaj's conditions of release permit him to travel without the Court's approval within: 1) EDNY, SDNY; and 2) the SDFI and NDNY as long as he receives permission from Pretrial Services.

We have discussed these requests with AUSAs Keith Edelman and Kayla Bensing as well as the Pretrial Services Office and they do not object to the proposed modification.

If Your Honor has any questions, of course we would be happy to answer them.

Sincerely,

s/Glenn Colton

cc: Counsel of Record (*via ECF*)  
AUSAs Keith Edelman and Kayla Bensing (*via ECF*)  
Pretrial Services Officer Chijioke Ezenyilimba (*via e-mail*)